

UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF ALABAMA

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Case No. 19-32000

CEDRIC F. SHUFFORD

MOTION TO LIFT CO-DEBTOR STAY

Comes now Cora Buckhanon, hereinafter Petitioner, a creditor in the above-styled cause, and moves this Honorable Court to lift the Co-Debtor stay pursuant to §1301 of the Bankruptcy Code protecting Co-Debtor Veronica Taylor. As grounds therefore, Petitioner relies on the following:

1. The debtor filed this voluntary Chapter 13 case on 07/20/2019.
2. Veronica Taylor is a Co-Debtor on this account.
4. Petitioner requests that the court lift the Co-Debtor stay to allow it to proceed against Veronica Taylor for the unsecured balance, plus interest, and attorney's fees.

WHEREFORE, THE PREMISES CONSIDERED, Petitioner moves this Honorable Court to lift the Co-Debtor stay pursuant to §1301 of the Bankruptcy Code so that Petitioner may attempt to collect all amounts of its claim.

Respectfully submitted,

/s/ Larry Darby
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the forgoing upon the following interested parties electronically or by placing a copy of the same in the U.S. Mail on the date that this document was filed in the above case.

Hon. Stephen Klimjack
Attorney for Cedric Shufford
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Hon. Sabrina L. McKinney
Trustee
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Montgomery, AL 36104

Veronica Taylor
Co-Debtor
PO Box 4124
Montgomery, AL 36103

/s/ Larry Darby
Larry E. Darby